

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

EDMOND GRANT P/K/A “EDDY GRANT”,
GREENHEART MUSIC LIMITED, a United
Kingdom Limited Company, and
GREENHEART MUSIC LIMITED, an
Antigua and Barbuda Limited Company,

Plaintiffs,

-against-

DONALD J. TRUMP and DONALD J.
TRUMP FOR PRESIDENT, INC.

Defendants.

Civil Action No. 1:20-cv-07103-JGK

**DECLARATION OF JASON H.
KASNER IN SUPPORT OF
DEFENDANTS’ MOTION FOR
PARTIAL SUMMARY JUDGEMENT**

**DECLARATION OF JASON H. KASNER IN SUPPORT OF
DEFENDANTS’ MOTION FOR PARTIAL SUMMARY JUDGEMENT**

Pursuant to 28 U.S.C. § 1746, I, Jason H. Kasner, hereby declare as follows:

1. I am an attorney at the law firm of Peroff Saunders P.C., counsel for defendants Donald J. Trump (“Trump”) and Donald J. Trump For President, Inc. (the “Company”) (collectively, “Defendants”) in the above-captioned action. I am fully familiar with the matters set forth herein. I respectfully submit this declaration in support of Defendants’ motion for partial summary judgment.

2. Annexed hereto as Exhibit A is a copy of a document that purports to be a “Confirmatory Assignments of RIGHTS UNDER COPYRIGHT”, that is dated August 29, 2020 and that appears to have been signed by plaintiff Edmond Grant P/K/A “Eddy Grant” (“Grant”), and which bears bates number GRANT0152.

3. Annexed hereto as Exhibit B is a copy of what counsel for the plaintiffs herein have represented to be records from the U.S. Copyright Office reflecting the copyright registration of a certain musical composition under registration number PA0000164029 on or about February 7, 1983, and which bears bates numbers GRANT0188-189.

4. Annexed hereto as Exhibit C is a copy of what counsel for the plaintiffs herein have represented to be records from the U.S. Copyright Office reflecting the copyright registration of a certain sound recording under registration number SR0000344006 on or about March 22, 2002, and which bears bates numbers GRANT0186-87.

5. Annexed hereto as Exhibit D is a copy of Responses and Objections to Defendants' Fourth Set of Interrogatories to Plaintiffs [Nos. 15-25].

6. Annexed hereto as Exhibit E is a copy of Responses and Objections to Defendants' Third Set of Document Requests to Plaintiffs [Nos. 41-45].

7. Annexed hereto as Exhibit F is a copy of the Declaration of Wallace E.J. Collins, III, Esq., dated May 31, 2022.

8. Annexed hereto as Exhibit G is a copy of an article from the website of NBC News, dated September 1, 2020, and which bears bates numbers DEF_000135-142.

9. Annexed hereto as Exhibit H are excerpts from the *Compendium of U.S. Copyright Office Practices* (3d ed.).

10. Annexed hereto as Exhibit I is a copy of Copyright Circular 56A entitled "Copyright Registration of Musical Compositions and Sound Recordings."

11. Annexed hereto as Exhibit J is a copy of Copyright Circular 56 entitled "Copyright Registrations for Sound Recordings."

12. I declare under the penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: September 15, 2023

Dated: New York, New York
September 15, 2023

Respectfully submitted,

/s/ Jason H. Kasner
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*Attorneys for Defendants
Donald J. Trump and Donald J. Trump for
President, Inc.*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on September 15, 2023, a copy of the foregoing document was filed via this Court's electronic filing system and thereby served upon all counsel of record.

Date: September 15, 2023

/s/ Jason H. Kasner
Jason H. Kasner